

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LATERICA FINLEY,

Plaintiff,

v.

**JIMMY LEE JONES and WERNER
ENTERPRISES, INC.,**

Defendants.

CIVIL ACTION FILE NO.

**REMOVED FROM SUPERIOR
COURT OF COBB COUNTY
CIVIL ACTION FILE NO.
22100849**

DEFENDANTS' NOTICE OF REMOVAL

TO: The Honorable Judges of the United States District Court for the Northern District of Georgia, Atlanta Division:

COME NOW, Jimmy Lee Jones and Werner Enterprises, Inc. (hereinafter “Defendants”), and file the following Notice of Removal to United States District Court, showing the Court as follows:

1. A civil action was filed on February 8, 2022, in the Superior Court of Cobb County, State of Georgia. That action is designated there as Civil Action File No.: 22100849. Defendants first received notice of the suit on the day it was served,

February 10, 2022. This removal is timely filed. Plaintiff has previously submitted a demand to Defendants in the amount of \$300,000.00.

2. Defendants file herewith a copy of all process, pleadings, and orders received by Defendants in Civil Action File No.: 22100849, pursuant to 28 USC §1446.

3. Defendant Jimmy Lee Jones is an individual and citizen residing with the intent to remain in the State of Arkansas.

4. Defendant Werner, is now, was at the commencement of Civil Action File No.: 22100849, and at all times since has been an entity organized and existing under the laws of the State of Nebraska.

5. Defendant Werner's Principal Office at the time of filing of Civil Action File No.: 22100849 was, and at all times since has been located in Omaha, NE.

6. Upon information and belief, Plaintiff is an individual residing in the State of Georgia.

7. The action described above is a civil action with a claim of which this Court has original jurisdiction, and it is one that may be removed to this Court by the Defendant pursuant to the provisions of 28 USC §§ 1332 and 1441 et seq., in that there

is complete diversity among the Parties, the Parties are not residents of the same State, and the amount in controversy exceeds \$75,000.00 exclusive of interest and costs.

- a. Plaintiff has previously submitted a demand to Defendants in the amount of \$300,000.00
- b. "Amount in controversy" means simply the amount sought by Plaintiff that can be legally awarded by the fact-finder. "The jurisdictional fact in this case is not whether the damages are greater than the requisite amount, but whether a fact finder might legally conclude that they are: In other words, an amount that a plaintiff claims is not 'in controversy' if no fact finder could legally award it." *Kopp v. Kopp*, 280 F.3d 883, 885 (8th Cir., 2002). "[T]he plaintiffs' likelihood of success on the merits is largely irrelevant to the court's jurisdiction because the pertinent question is what is in controversy in the case, not how much the plaintiffs are ultimately likely to recover." *Pretka v. Kolter City Plaza II, Inc.*, 608 F.3d 744, 751 (11th Cir., 2010). In a tort case the amount in controversy includes "general, special, and punitive damages." *Williams v. Best Buy Co.*, 269 F.3d 1316, 1320 (11th Cir., 2001).

8. Defendant attaches hereto a copy of the Summons and Complaint in Superior Court of Cobb County, State of Georgia, marked as Exhibit “A”.

9. Defendant attaches hereto a copy of Defendants’ Notice of Removal which has been sent for filing in the Superior Court of Cobb County, State of Georgia, marked as Exhibit “B”.

10. All Defendants agree to this removal.

WHEREFORE the Defendant prays that the above action now pending against them in the Superior Court of Cobb County, State of Georgia, be removed to this Court.

Respectfully submitted this 11th day of March, 2022.

HALL BOOTH SMITH, PC

/s/ Sean B. Cox

SEAN B. COX

Georgia State Bar No. 664108

MARK D. CHRISTOPHER

Georgia State Bar No. 821387

Counsel for Defendants

191 Peachtree Street NE, Suite 2900

Atlanta, GA 30303-1775

T: (404) 954-5000

F: (404) 954-5020

scox@hallboothsmith.com

mchristopher@hallboothsmith.com

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LATERICA FINLEY,

Plaintiff,

v.

**JIMMY LEE JONES and WERNER
ENTERPRISES, INC.,**

Defendants.

CIVIL ACTION FILE NO.

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22100849**

CERTIFICATE OF COMPLIANCE

The foregoing **DEFENDANTS' NOTICE OF REMOVAL** is double spaced in 14 point Times New Roman font and complies with the type-volume limitation set forth in Local Rule 7.1.

Respectfully submitted this 11th day of March, 2022.

HALL BOOTH SMITH, PC

/s/ Sean B. Cox

SEAN B. COX

Georgia State Bar No. 664108

MARK D. CHRISTOPHER

Georgia State Bar No. 821387

Counsel for Defendants

191 Peachtree Street NE, Suite 2900

Atlanta, GA 30303-1775

T: (404) 954-5000

F: (404) 954-5020

scox@hallboothsmith.com

mchristopher@hallboothsmith.com

EXHIBIT A



Corporate Creations Network Inc.
801 US Highway 1 North Palm Beach, FL 33408

Werner Enterprises, Inc.
Sandy Wagner
Werner Enterprises
14507 Frontier Road
Omaha NE 68138

Jones, Jimmy
2020672982
11-19-20

02/11/2022

LM
Atn MP

SERVICE OF PROCESS NOTICE

The following is a courtesy summary of the enclosed document(s). **ALL information should be verified by you.**

Item: 2022-32

Note: Any questions regarding the substance of the matter described below, including the status or how to respond, should be directed to the contact set forth in line 12 below or to the court or government agency where the matter is being heard. **IMPORTANT:** All changes or updates to the SOP contact individuals or their contact information must be submitted in writing to SOPcontact@corpcreations.com. Any changes will become effective upon written confirmation of Corporate Creations.

1.	Entity Served:	Werner Enterprises, Inc.
2.	Title of Action:	Laterica Finley vs. Jimmy Lee Jones and Werner Enterprise, Inc.
3.	Document(s) Served:	Sheriff's Entry of Service Summons Disclosure Statement General Civil and Domestic Relations Case Disposition Information Form
4.	Court/Agency:	Cobb County Superior Court
5.	State Served:	Georgia
6.	Case Number:	22100849
7.	Case Type:	Negligence/Personal Injury
8.	Method of Service:	Hand Delivered
9.	Date Received:	Thursday 02/10/2022 **
10.	Date to Client:	Friday 02/11/2022
11.	# Days When Answer Due: Answer Due Date:	30 Saturday 03/12/2022 <small>CAUTION: Client is solely responsible for verifying the accuracy of the estimated Answer Due Date. To avoid missing a crucial deadline, we recommend immediately confirming in writing with opposing counsel that the date of the service in their records matches the Date Received.</small>
12.	Sop Sender: <small>(Name, City, State, and Phone Number)</small>	Sanford Hill Summerville, GA 706-859-7777
13.	Shipped To Client By:	Email Only with PDF Link
14.	Tracking Number:	
15.	Handled By:	111
16.	Notes:	Also Attached: * Complaint * Exhibit "A"

NOTE: This notice and the information above is provided for general informational purposes only and should not be considered a legal opinion. The client and their legal counsel are solely responsible for reviewing the service of process and verifying the accuracy of all information. At Corporate Creations, we take pride in developing systems that effectively manage risk so our clients feel comfortable with the reliability of our service. We always deliver service of process so our clients avoid the risk of a default judgment. As registered agent, our role is to receive and forward service of process. To decrease risk for our clients, it is not our role to determine the merits of whether service of process is valid and effective. It is the role of legal counsel to assess whether service of process is invalid or defective. Registered agent services are provided by Corporate Creations Network Inc.

SERVE**SERVE****SHERIFF'S ENTRY OF SERVICE**Civil Action No. 22100849

Date Filed _____

Attorney's Address Hill, Sanford
Law Offices, PC
P.O. Box 140
136 Highway 48
Summerville, GEORGIA 30747-

Name and Address of Party to be Served.
WERNER ENTERPRISE, INC.

2985 GORDY PARKWAY, 1ST FLOORMARIETTA, GEORGIA 30006

Superior Court ☒
 State Court ☐
 Juvenile Court ☐

Magistrate Court ☐
 Probate Court ☐

Georgia, COBB COUNTYFINLEY, LATERICA

Plaintiff

VS.
JONES, JIMMY LEE; WERNER ENTERPRISE, INC.,

DBA C/O CORPORATE CREATIONS NETWORK, INC.

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

☐ I have this day served the defendant _____ personally with a copy
 of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a
 copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of _____ described as follows:
 age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of
 defendant.

CORPORATION

Served the defendant Werner Enterprise Inc a corporation
☒ by leaving a copy of the within action and summons with Anna Moore Corporate
 in charge of the office and place of doing business of said Corporation in the County. Creations Network

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the
 door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the
☐ same in the United States Mail, first class in an envelope properly address to the defendant(s) at the address shown in said
 summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the
 place stated in the summons.

NON EST

☐ Diligent search made and defendant
 not to be found in the jurisdiction of this court.

This 10 day of FEB, 20 22

Deputy

COPY

**SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA**

ID# 2022-0017117-CV
FILED IN OFFICE
CLERK OF SUPERIOR COURT
COBB COUNTY, GEORGIA
22100849
Ann B. Harris - 56
FEB 08, 2022 08:56 AM



Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

CIVIL ACTION NUMBER 22100849

\$214.00 COST PAID

FINLEY, LATERICA

PLAINTIFF

VS.

JONES, JIMMY LEE
WERNER ENTERPRISE, INC., DBA C/O
CORPORATE CREATIONS NETWORK,
INC.

DEFENDANTS

SUMMONS

TO: WERNER ENTERPRISE, INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Sanford Hill
Law Offices, PC
P.O. Box 140
136 Highway 48
Summerville, Georgia 30747

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 8th day of February, 2022.

Clerk of Superior Court



Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

COPY

**SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA**

ID# 2022-0017116-CV
EFILED IN OFFICE
CLERK OF SUPERIOR COURT
COBB COUNTY, GEORGIA
22100849
Ann B. Harris - 56
FEB 08, 2022 08:56 AM



Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

CIVIL ACTION NUMBER 22100849

\$214.00 COST PAID

FINLEY, LATERICA

PLAINTIFF

VS.

JONES, JIMMY LEE
WERNER ENTERPRISE, INC., DBA C/O
CORPORATE CREATIONS NETWORK,
INC.

DEFENDANTS

SUMMONS

TO: JONES, JIMMY LEE

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Sanford Hill
Law Offices, PC
P.O. Box 140
136 Highway 48
Summerville, Georgia 30747

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 8th day of February, 2022.

Clerk of Superior Court




Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

ID# 2022-0017119-CV
FILED IN OFFICE
CLERK OF SUPERIOR COURT
COBB COUNTY, GEORGIA
22100849
Ann B. Harris - 56
FEB 08, 2022 08:56 AM

DISCLOSURE STATEMENT
CLERK OF SUPERIOR COURT

CASE NUMBER 22100849


Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

FINLEY, LATERICA

Plaintiff

Vs.

JONES, JIMMY L; WERNER ENTERPRISE, INC.

Defendant

TYPE OF ACTION

- | | |
|---|-----------------------------------|
| <input type="radio"/> Divorce without Agreement Attached | <input type="radio"/> URESA |
| <input type="radio"/> Divorce with Agreement Attached | <input type="radio"/> Name Change |
| <input type="radio"/> Domestic Relations | <input type="radio"/> Other |
| <input type="radio"/> Damages Arising out of Contract | <input type="radio"/> Recusal |
| <input checked="" type="radio"/> Damages Arising out of Tort | <input type="radio"/> Adoption |
| <input type="radio"/> Condemnation | |
| <input type="radio"/> Equity | |
| <input type="radio"/> Zoning – County Ordinance Violations (i.e., Injunctive Relief-Zoning) | |
| <input type="radio"/> Zoning Appeals (denovo) | |
| <input type="radio"/> Appeal, Including denovo appeal – excluding Zoning | |

PREVIOUS RELATED CASES

Does this case involve substantially the same parties, or substantially the same subject matter, or substantially the same factual issues, as any other case filed in this court (Whether pending simultaneously or not)?

- ☒ NO
☐ YES – If yes, please fill out the following:

1. Case # _____

2. Parties _____

3. Assigned Judge _____

4. Is this case still pending? ☐ Yes ☐ No

5. Brief description of similarities:

/S/ Hill, Sanford

Attorney or Party Filing Suit

ID# 2022-0017118-CV
FILED IN OFFICE

General Civil and Domestic Relations Case Filing Information Form

CLERK OF SUPERIOR COURT
COBB COUNTY, GEORGIA☒ Superior or ☐ State Court of Cobb County

22100849

Ann B. Harris - 56

FEB 08, 2022 08:56 AM

For Clerk Use Only

Date Filed 02-08-2022

MM-DD-YYYY

Case Number 22100849

Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

Plaintiff(s)

FINLEY, LATERICA

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney Hill, Sanford

Defendant(s)

JONES, JIMMY LEE

Last First Middle I. Suffix Prefix

WERNER ENTERPRISE, INC.

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Bar Number 354505

Self-Represented ☐

Check one case type and, if applicable, one sub-type in one box.

General Civil Cases

- ☒ Automobile Tort
- ☐ Civil Appeal
- ☐ Contract
- ☐ Contempt/Modification/Other Post-Judgment
- ☐ Garnishment
- ☐ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony
- ☐ Dissolution/Divorce/Separate Maintenance/Alimony
- ☐ Family Violence Petition
- ☐ Modification
- ☐ Custody/Parenting Time/Visitation
- ☐ Paternity/Legitimation
- ☐ Support - IV-D
- ☐ Support - Private (non-IV-D)
- ☐ Other Domestic Relations

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

SHERIFF'S ENTRY OF SERVICECivil Action No. 22100849

Date Filed _____

Attorney's Address Hill, Sanford
Law Offices, PC
P.O. Box 140
136 Highway 48
Summerville, GEORGIA 30747-

Name and Address of Party to be Served.
WERNER ENTERPRISE, INC.

2985 GORDY PARKWAY, 1ST FLOORMARIETTA, GEORGIA 30006Superior Court ☒State Court ☐Juvenile Court ☐Magistrate Court ☐Probate Court ☐Georgia, COBB COUNTYFINLEY, LATERICA

Plaintiff

VS.

JONES, JIMMY LEE; WERNER ENTERPRISE, INC.,DBA C O CORPORATE CREATIONS NETWORK, INC.

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

☐ I have this day served the defendant _____ personally with a copy
of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a
copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of _____ described as follows:
age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of
defendant.

CORPORATION

Served the defendant _____ a corporation
☐ by leaving a copy of the within action and summons with _____
in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL


☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the
door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the
same in the United States Mail, first class in an envelope properly address to the defendant(s) at the address shown in said
summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the
place stated in the summons.

NON EST

☐ Diligent search made and defendant _____
not to be found in the jurisdiction of this court.

This _____ day of _____, 20____

Deputy

ID# 2022-0017115-CV
EFILED IN OFFICE
CLERK OF SUPERIOR COURT
COBB COUNTY, GEORGIA
22100849
Ann B. Harris - 56
FEB 08, 2022 08:56 AM

Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

IN THE *SUPERIOR COURT OF COBB COUNTY*
STATE OF GEORGIA

LATERICA FINLEY

Plaintiff,

v.

JIMMY LEE JONES, and WERNER
ENTERPRISE, INC.,

Defendants.

CIVIL ACTION

FILE NO.: _____

JURY TRIAL DEMANDED

COMPLAINT

COMES NOW *LATERICA FINLEY*, plaintiff, and makes and files this complaint against defendants *JIMMY LEE JONES, and WERNER ENTERPRISE, INC.* as follows:

PARTIES AND JURISDICTION

1.

Plaintiff *LATERICA FINLEY* resides at *146 Abner Drive, Cedartown, GA 30125*, and is subject to the jurisdiction of this court.

2.

Defendant *JIMMY LEE JONES* resides at *4397 Bells Chapel Road, E., Atkins, AR 72823-5919*, and may be served with a copy of the summons and complaint at this address. Service of Process is made pursuant to O.C.G.A. § 9-10-94.

3.

WERNER ENTERPRISE, INC. is a *FOREIGN* corporation existing under the laws of *GEORGIA* with its principal place of business in *NEBRASKA* and may be served through its registered agent *CORPORATE CREATIONS NETWORK, INC.* at 2985 Gordy Parkway, 1st floor, Marietta, GA 30006, and is subject to the jurisdiction of this court.

4.

Jurisdiction and venue are proper in this court.

BACKGROUND

6.

On or about November 19, 2020, plaintiff was driving her vehicle on I-75 South near the intersection of Pine Grove Road in Catoosa County, Georgia.

7.

Defendant JIMMY LEE JONES was driving his vehicle on I-75 South near the intersection of Pine Grove Road in Catoosa County, Georgia.

8.

On this date, defendant JIMMY LEE JONES was operating his commercial vehicle on behalf of defendant *WERNER ENTERPRISE, INC.*

9.

Defendant JIMMY LEE JONES was traveling on I-75 South near the intersection of Pine Grove Road in Catoosa County, Georgia, when he attempted to change lanes and struck the passenger side of Plaintiff's vehicle with the left rear hubcap on the trailer he was pulling.

10.

As a result of the collision, plaintiff suffered severe and permanent injuries.

COUNT 1
NEGLIGENCE

11.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 10 above as if fully restated.

12.

Defendant *JIMMY LEE JONES* was negligent in the following manner:

- (a) *Improper lane change.*
- (b) *Failure to maintain proper lookout.*

13.

Defendant *JIMMY LEE JONES* was negligent in making an improper lane change and failing to maintain a proper lookout for plaintiff's vehicle and colliding with plaintiff's vehicle.

14.

Defendant *JIMMY LEE JONES* negligence is the sole and proximate cause of the collision, and plaintiff's resulting injuries.

COUNT 2
IMPUTED LIABILITY

15.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 14 above as if fully restated.

16.

At the time of the subject collision, defendant *JIMMY LEE JONES* was under dispatch for defendant *WERNER ENTERPRISE, INC.*

17.

At the time of the subject collision, defendant *JIMMY LEE JONES* was operating his vehicle on behalf of defendant *WERNER ENTERPRISE, INC.*

18.

Defendant *WERNER ENTERPRISE, INC.* is an intrastate or interstate company, and pursuant to federal and state laws, is responsible for the actions of defendant *JIMMY LEE*

JONES in regard to the collision described in this complaint under the doctrine of lease liability, agency or apparent agency.

COUNT 3

NEGLIGENT HIRING, TRAINING & SUPERVISION

19.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 18 above as if fully restated.

20.

Defendant *WERNER ENTERPRISE, INC.* was negligent in hiring defendant *JIMMY LEE JONES* and entrusting him to drive a commercial vehicle.

21.

Defendant *WERNER ENTERPRISE, INC.* was negligent in failing to properly train defendant *JIMMY LEE JONES*.

22.

Defendant *WERNER ENTERPRISE, INC.* was negligent in failing to properly supervise defendant *JIMMY LEE JONES*.

23.

Defendant *WERNER ENTERPRISE, INC.*'s negligence in hiring defendant *JIMMY LEE JONES* and entrusting him with driving a commercial vehicle and failing to train and supervise him properly was the sole and proximate cause of the collision, and plaintiff's resulting injuries.

COUNT 4

DAMAGES

29.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 28 above as if fully restated.

30.

As a result of defendants' negligence, plaintiff suffered *neck pain, back pain, headaches, concussion, and Traumatic Brain Injury*.

31.

As a result of defendants' negligence, plaintiff has incurred past medical expenses and will continue to incur future medical expenses (See Exhibit "A" attached).

32.

As a result of defendants' negligence, plaintiff has been unable to work and has a claim for past and future lost wages.

33.

Defendants' negligence is the sole and proximate cause of plaintiff's injuries.

WHEREFORE, plaintiff prays that she has a trial on all issues and judgment against defendants as follows:

- a. That plaintiff recovers the full value of past and future medical expenses and past and future lost wages in an amount to be proven at trial;
- b. That plaintiff recovers for physical and mental pain and suffering in an amount to be determined by the enlightened conscience of a jury;
- c. That plaintiff recovers punitive damages in an amount to be determined by the enlightened conscience of a jury; and
- d. That plaintiff recovers such other and further relief as is just and proper.

This 8th day of February, 2022.

LAW OFFICE, PC

By: 

SANFORD M. HILL

Georgia Bar No. 354505

Attorney for Plaintiff

P.O. BOX 140

136 HIGHWAY 48

SUMMERVILLE, GA 30747

706-859-7777

Fax: 706-857-0099

E-mail: SANFORDHILL@WINDSTREAM.NET

LATERICA FINLEY

SPECIALS

FLOYD MEDICAL CENTER P.O. BOX 233 ROME, GA 30162-0233 706-509-6000 ACCOUNT #: 20324-00946	\$3,501.00
ETOWAH EMERGENCY PHYSICIANS P.O. BOX 740937 ATLANTA, GA 30374-0937 678-507-0333 ACCOUNT #: 11070224V14272	\$645.00
ROME RADIOLOGY GROUP PA P.O. BOX 3253 INDIANAPOLIS, IN 46206-3253 844-265-1935 ACCOUNT #: 40180-RRG1	\$600.00
LESLIE A. TUCKER, D.C. 500 CEDAR AVE SW ROME, GA 30161-6714 706-290-0408 ACCOUNT #: 7464	\$6,455.00
TBI DIAGNOSTIC CENTERS OF GEORIGIA 2 WEBSTER ST NW ROME, GA 30165 678-277-5022	\$2,328.26
NEUROPSYCH CENTERS OF GEORGIA 368 WEST PIKE ST. LAWRENCEVILLE, GA 30046 678-538-9314	\$5,050.00
TOTAL:	\$18,579.26

Exhibit "A"

FEB 10 2022

EXHIBIT B

**IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA**

LATERICA FINLEY,

Plaintiff,

v.

**JIMMY LEE JONES and WERNER
ENTERPRISES, INC.**

Defendants.

CIVIL ACTION FILE NO.

22100849

DEFENDANTS' NOTICE OF REMOVAL TO UNITED STATES DISTRICT COURT

COME NOW, Jimmy Lee Jones and Werner Enterprises, Inc. (hereinafter “Defendants”), and file the following Notice of Removal to United States District Court, showing the Court as follows:

1. Defendants have filed a Notice of Removal to United States District Court. A true and correct copy of the Notice is attached as Ex. “A”.

2. As a result thereof, this matter is automatically stayed and the action removed to United States District Court, for the Northern District of Georgia, pursuant to 28 U.S.C. § 1441 *et seq.*

Respectfully submitted this 11th day of March, 2022.

HALL BOOTH SMITH, P.C.

/s/ Mark D. Christopher

SEAN B. COX

Georgia State Bar No. 664108

MARK D. CHRISTOPHER

Georgia State Bar No. 821387

Attorneys for Defendants

191 Peachtree Street NE, Suite 2900

Atlanta, GA 30303-1775

T: 404.954.5000

F: 404.954.5020

scox@hallboothsmith.com

mchristopher@hallboothsmith.com

**IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA**

LATERICA FINLEY,

Plaintiff,

v.

**JIMMY LEE JONES and WERNER
ENTERPRISES, INC.**

Defendants.

CIVIL ACTION FILE NO.

22100849

CERTIFICATE OF SERVICE

I hereby certify that on this day I have served a copy of the within and foregoing **DEFENDANTS' NOTICE OF REMOVAL TO UNITED STATES DISTRICT COURT** upon all parties to this matter by depositing same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows and/or filing said document with Odyssey E-File which will automatically send electronic notification to the following:

Sanford M. Hill
P.O. Box 140
136 Highway 48
Summerville, GA 30747
sanfordhill@windstream.net

Respectfully submitted this 11th day of March, 2022.

HALL BOOTH SMITH, P.C.

/s/ Mark D. Christopher

SEAN B. COX

Georgia State Bar No. 664108

MARK D. CHRISTOPHER

Georgia State Bar No. 821387

Attorneys for Defendants

191 Peachtree Street NE, Suite 2900
Atlanta, GA 30303-1775

T: 404.954.5000

F: 404.954.5020

scox@hallboothsmith.com

mchristopher@hallboothsmith.com

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LATERICA FINLEY,

Plaintiff,

v.

**JIMMY LEE JONES and WERNER
ENTERPRISES, INC.,**

Defendants.

CIVIL ACTION FILE NO.

**REMOVED FROM SUPERIOR
COURT OF COBB COUNTY
CIVIL ACTION FILE NO.
22100849**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing **DEFENDANTS' NOTICE OF REMOVAL** upon all parties to this matter by depositing a true copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows and/or filing said document with the CM/ECF system which will automatically send electronic notification to the following:

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Respectfully submitted this 11th day of March, 2022.

HALL BOOTH SMITH, PC

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